

EXHIBIT C

Ester Lorusso

12/19/2007

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

Page 1

3 ESTER LORUSSO,

4 Plaintiff,

5 Case No.
6 07CV3583 (LBS) (RLE)

7 -against-

8 ALITALIA-LINEE AEREE ITALIANE SpA

9 Defendant.

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13
14 Videotaped Deposition of Ester Lorusso

15 December 19, 2007

16 New York, New York

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21
22
23 REPORTED BY:

24 Helen Mendlowich

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<p style="text-align: right;">Page 46</p> <p>1 LORUSSO</p> <p>2 Q. Maybe to save time, is that true as well 3 for contempt for females and homosexuals, that you 4 can't recall any specific instances that Mr. Gallo 5 gave you?</p> <p>6 A. No. They were just general statements 7 that he would make, but I don't remember the 8 specific instances.</p> <p>9 Q. Do you believe he made those statements 10 more than once to you?</p> <p>11 A. Yes.</p> <p>12 Q. Did he ever put a statement like this in 13 writing that you have seen?</p> <p>14 A. No.</p> <p>15 Q. Did Mr. Gallo indicate to you that he had 16 ever protested anything that he regarded as 17 expressions by leaders of the company of contempt 18 for older employees, females or homosexuals?</p> <p>19 A. Yes.</p> <p>20 Q. What do you recall him telling you about 21 his protesting?</p> <p>22 A. Specifically to discriminating against me 23 at the time it was happening. I believe he told 24 Libutti that it was unlawful to discriminate against 25 female employees in the United States.</p>	<p style="text-align: right;">Page 48</p> <p>1 LORUSSO</p> <p>2 Q. Wasn't it director of sales and alliances?</p> <p>3 A. That could be, yes.</p> <p>4 Q. Do you know when Tim O'Neill came back to 5 Alitalia in that capacity?</p> <p>6 A. It was either 2003 or 2004. 2003, I 7 think. 2003, I believe.</p> <p>8 Q. Had you held that position of director of 9 sales and alliances?</p> <p>10 A. No.</p> <p>11 Q. So Tim O'Neill wasn't taking that position 12 away from you when he got it?</p> <p>13 A. No.</p> <p>14 Q. When was Tim O'Neill given your position?</p> <p>15 A. It was throughout the time that our boss 16 was Giulio Libutti.</p> <p>17 Q. Mr. Libutti came in the summer of 2003; is 18 that correct?</p> <p>19 A. I believe so.</p> <p>20 Q. So starting when Mr. Libutti came and 21 continuing onward Mr. Libutti was giving your 22 responsibilities to Tim O'Neill?</p> <p>23 A. Slowly, yes.</p> <p>24 Q. You say that Mr. Gallo told you that he 25 told Mr. Libutti that this was sex discrimination</p>
<p style="text-align: right;">Page 47</p> <p>1 LORUSSO</p> <p>2 Q. When did Mr. Gallo tell you that he told 3 Libutti that it was unlawful to discriminate against 4 female employees in the United States in connection 5 with your situation?</p> <p>6 A. I don't remember.</p> <p>7 Q. Can you recall what position you were in 8 at the time that Mr. Gallo says that he said this to 9 Libutti?</p> <p>10 A. No.</p> <p>11 Q. Can you recall what the details of the 12 discrimination were that Mr. Gallo was supposedly 13 protesting to Libutti?</p> <p>14 A. Yes. That my job was being given to a 15 male employee.</p> <p>16 Q. And is that male employee Tim O'Neill?</p> <p>17 A. Yes.</p> <p>18 Q. Tim O'Neill had been the head of Italia 19 Tours?</p> <p>20 A. Yes, years back.</p> <p>21 Q. And then Tim O'Neill came back to Alitalia 22 in the Passenger Division?</p> <p>23 A. Yes.</p> <p>24 Q. What was his title?</p> <p>25 A. I believe it was director of alliances.</p>	<p style="text-align: right;">Page 49</p> <p>1 LORUSSO</p> <p>2 and that it was illegal in the U.S.?</p> <p>3 A. I'm sorry, repeat your question. (Testimony was read back.)</p> <p>4 A. Yes.</p> <p>5 Q. Yes is the answer.</p> <p>6 You probably answered this but now that we 7 are talking about it, can you recall approximately 8 when Mr. Gallo told you that he told this to 9 Libutti?</p> <p>10 A. I don't recall.</p> <p>11 Q. You don't recall when Gallo told you?</p> <p>12 A. Right.</p> <p>13 Q. Do you know if Gallo told you when he told 14 this to Libutti?</p> <p>15 A. Do I recall --</p> <p>16 Q. Well, he could have said it in 2003, 17 apparently, he could have said it in 2004. Libutti 18 was there until 2006.</p> <p>19 Do you have any idea when Gallo said to 20 Libutti, this is sex discrimination, it's illegal?</p> <p>21 A. It had to have been after I first made a 22 complaint.</p> <p>23 Q. Would that be around September of 2004?</p> <p>24 A. That would be in the summer of 2004.</p>

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<p>1 LORUSSO 2 employed, at the time. 3 Q. But first answer my question which has to 4 do, Mr. Libutti have anything to do with the Cargo 5 department? 6 A. No. 7 Q. Do you know if Mr. Libutti was the person 8 who arranged for you to get a job in the Cargo 9 department in 2006? 10 A. No. 11 Q. Do you know whether he had any influence 12 on that placement, I'll call it, or on that job 13 opportunity? 14 A. I don't know. 15 Q. As you mentioned, Mr. Libutti was, in 16 fact, no longer employed at Alitalia at the time of 17 your termination, correct? 18 A. That is correct. I believe that's 19 correct. 20 Q. He certainly was no longer in New York at 21 the time, correct? 22 A. Right. 23 Q. You said earlier that Mr. Libutti said — 24 I don't want to put words in your mouth — but 25 essentially set in motion the chain of events that</p>	<p>Page 126</p> <p>1 LORUSSO 2 A. A hundred and five. 3 Q. So you had a salary increase of more than 4 25 percent when you went to GA2000? 5 A. Right. The salary increase came by way of 6 my refusing to go to GA2000, and Libutti would come 7 back with a higher amount in order to entice me to 8 go to GA2000. 9 Q. What was your title at GA2000? 10 A. Managing director. 11 Q. What was your title before you went to 12 GA2000? 13 A. Director of managing. 14 Q. Is a managing director higher than a 15 director? 16 A. Managing director of a sinking ship is not 17 higher than a director of marketing in a company 18 that was sound. 19 Q. But you were managing director at GA2000, 20 correct? 21 A. Yes, I was. 22 Q. And you were just a director when you were 23 in Passenger? 24 A. Yes, I was. 25 Q. Your salary was 80,000?</p>
<p>1 LORUSSO 2 led to your termination? 3 A. That's correct. 4 Q. What are you referring to specifically? 5 A. Mr. Libutti step-by-step was taking away 6 my responsibilities and giving them to my male 7 counterpart. 8 Q. You mean Tim O'Neill? 9 A. Tim O'Neill. 10 Q. And so you consider that is how Mr. 11 Libutti — 12 A. — began — 13 Q. — began the process of your termination? 14 A. Correct. 15 Q. The first thing he did was to promote you 16 to GA2000, correct? 17 MS. KURZON: Objection to the term 18 "promote." Transferred? 19 Q. Weren't you promoted to GA2000? 20 A. I was transferred to G A 2000. 21 Q. What was your salary before you went to 22 GA2000? 23 A. Eighty thousand. 24 Q. What was your salary when you were at 25 GA2000?</p>	<p>Page 127</p> <p>1 LORUSSO 2 A. That's correct. 3 Q. And went up to 105,000? 4 A. That's correct. 5 Q. Did Mr. Libutti tell you that GA2000 was a 6 sinking ship? 7 A. Everyone knew it was a sinking ship. 8 Q. The question is whether Mr. Libutti did? 9 A. No. He did not. 10 Q. Did Mr. Gallo say so? 11 A. No. He did not. 12 Q. Did anybody say so specifically? 13 A. I don't believe so. 14 Q. But it was sort of common knowledge? 15 A. It was common knowledge that Alitalia was 16 closing companies, subsidiary companies that it 17 owned. 18 Q. Okay. And GA2000 was a subsidiary 19 company? 20 A. Yes, it was. 21 Q. So the conclusion was that it might be on 22 the list, so to speak, of things to be closed? 23 A. That's correct. 24 Q. I believe that you claimed that you made a 25 profit when you were at GA2000.</p>

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1 LORUSSO		1 LORUSSO
2 A. No, not my notes. Perhaps your notes.		2 A. Yes.
3 Q. Oh, we've given you what we have.		3 Q. So he didn't criticize the advertising —
4 You think that Mr. — somebody told you,		4 A. In other words, he came to the States and
5 you don't remember who, that Mr. Pausini changed the		5 said, This is the way we used to do it in Argentina.
6 review?		6 This is the way it should be done. This is the way
7 A. Yes. I believe he came to New York to do		7 we did it in Argentina.
8 it.		8 Q. Did you change the way you were doing
9 Q. He came to New York to change the review?		9 things to conform to what Mr. Libutti wanted?
10 A. Yes. One of the reasons why he was in New		10 A. I think I tried to appease him with
11 York.		11 certain things, yes.
12 Q. Because he had already been transferred		12 Q. With certain things?
13 back to Rome?		13 A. Yes.
14 A. Yes.		14 Q. But he continued to feel that he wanted it
15 Q. And Mr. Libutti was in charge here,		15 done differently?
16 correct?		16 A. Yes.
17 A. Yes.		17 Q. Paragraph 18 continues, "He made it clear
18 Q. Paragraph 18 says that "Mr. Libutti was		18 that women" — clear to you, I'm sorry — "that
19 immediately dismissive of plaintiff."		19 women were not meant to serve in executive
20 In what ways was Mr. Libutti dismissive of		20 capacities."
21 you immediately?		21 How did he do that?
22 A. He basically wanted to know about our		22 A. By taking parts of my job away and giving
23 advertising practices and made it clear to me that		23 them to Tim O'Neill.
24 that wasn't the way things should be done.		24 Q. What parts were those?
25 Q. Okay. Can you think of any specific		25 A. Yearly sales meeting.

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1 LORUSSO		1 LORUSSO
2 examples where he didn't like the way things were		2 Q. You used to run a yearly sales meeting?
3 being done?		3 A. The organization of the yearly sales
4 A. I can't think of anything specific right		4 meeting, yes.
5 now.		5 Q. You organized it?
6 Q. Did Mr. Libutti continue during the time		6 A. Yes.
7 he remained as director in marketing in the		7 Q. Whom did he give that to?
8 Passenger Division that he didn't like the way the		8 A. Tim O'Neill.
9 advertising was being done?		9 Q. Who?
10 A. Excuse me?		10 A. Tim O'Neill.
11 Q. Did Mr. Libutti continue to make it clear		11 Q. Tim O'Neill, who was in sales?
12 to you that he didn't like the way the advertising		12 A. Who was a fellow director.
13 was being done as long as you remained in Passenger?		13 Q. Tim O'Neill's title was sales and
14 A. Mr. Libutti was negative about anything		14 alliance —
15 that had to do with me, so it's hard to pinpoint		15 A. — coordination.
16 whether he continued or he didn't continue.		16 Q. — coordination?
17 Q. Did he continue, for example, to criticize		17 A. That's correct.
18 the advertising?		18 Q. The alliance referred to, by the way, just
19 A. He didn't continue to criticize the		19 so we were clear, that's the Sky Team alliance with
20 advertising. He would continue to criticize		20 Delta and other airlines?
21 anything I had to do.		21 A. That's correct.
22 Q. Well, advertising was a big —		22 Q. Air France, I think.
23 A. With the advertising.		23 Other than taking some of your
24 Q. Advertising was a big part of what you		24 responsibilities away, such as the yearly sales
25 did, correct?		25 meeting, how else did he make it clear to you that

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<p style="text-align: right;">Page 194</p> <p>1 LORUSSO</p> <p>2 women didn't belong in executive positions?</p> <p>3 A. By giving me menial tasks.</p> <p>4 Q. Mr. Libutti gave you menial tasks?</p> <p>5 A. Yes.</p> <p>6 Q. Such as?</p> <p>7 A. I recall one day he came in with shopping bags full of his home videos that he wanted transferred to DVDs.</p> <p>8 Q. Yes?</p> <p>9 A. And he handed them to me so that I could get them done for him.</p> <p>10 Q. So that you could get them done for him where?</p> <p>11 A. At our ad agency.</p> <p>12 Q. So it was the ad agency would did that, correct?</p> <p>13 A. They expected them to do that.</p> <p>14 Q. He didn't ask you to do it.</p> <p>15 A. He asked me to ask them to do it.</p> <p>16 Q. And you were the liaison to the ad agency.</p> <p>17 Wasn't that your principal job?</p> <p>18 A. Yes. At no cost, I might add.</p> <p>19 Q. Okay. The ad agency refused?</p> <p>20 A. I don't know what happened because I gave</p>	<p style="text-align: right;">Page 196</p> <p>1 LORUSSO</p> <p>2 clear to you that women were not meant to serve in executive capacities. You said, one, he transferred responsibilities away from you, one of it was the sales meeting. What else?</p> <p>3 A. We had a yearly symposium which my department organized. He also gave that to Tim O'Neill.</p> <p>4 Q. Who in your department did the organizing of that?</p> <p>5 A. Elizabeth Santella.</p> <p>6 Q. Elizabeth Santella?</p> <p>7 A. Yes.</p> <p>8 Q. What was her title at the time?</p> <p>9 A. I believe it was sales promotion manager.</p> <p>10 Q. Did Elizabeth --</p> <p>11 A. -- or marketing communications manager. I don't recall at the time.</p> <p>12 Q. Did he transfer Elizabeth Santella to report to Tim O'Neill at that time?</p> <p>13 A. No.</p> <p>14 Q. What else did he take away from you?</p> <p>15 A. The marketing component of the sales team alliance. I used to handle that and then he wanted Tim O'Neill to handle that.</p>
<p style="text-align: right;">Page 195</p> <p>1 LORUSSO</p> <p>2 the bag — I felt that I was in a compromising position because I was the liaison to the ad agency.</p> <p>3 So I handed the shopping bags to his secretary, to his assistant, and I asked her to follow up on it.</p> <p>4 Q. You told her to follow up on it?</p> <p>5 A. I asked her to.</p> <p>6 Q. You didn't do what Mr. Libutti asked, you told his secretary to do what Mr. Libutti asked?</p> <p>7 A. Mr. Libutti was asking me to do something that was personal in nature and not business.</p> <p>8 oriented and he was asking me to do it without being charged. So I really felt that I would be compromising my position as the liaison between the agency and Alitalia.</p> <p>9 Q. Did you tell that to Mr. Libutti's</p> <p>10 secretary?</p> <p>11 A. What do you mean?</p> <p>12 Q. Did you say to her, You better do this</p> <p>13 because I feel my position would be compromised if I give this to the ad agency?</p> <p>14 A. I believe I did.</p> <p>15 Q. Did you say it to Mr. Libutti?</p> <p>16 A. I don't recall.</p> <p>17 Q. Going back to ways in which he made it</p>	<p style="text-align: right;">Page 197</p> <p>1 LORUSSO</p> <p>2 Q. When you say, "the sales team," you mean the Sky Team alliance?</p> <p>3 A. I'm sorry, the Sky Team alliance.</p> <p>4 Q. So Tim started handling the marketing component of Sky Team?</p> <p>5 A. Yes.</p> <p>6 Q. How much of your job did that involve?</p> <p>7 A. I would say about 15 percent.</p> <p>8 Q. Anything else you can think of that was transferred?</p> <p>9 A. No, but I did write to Libutti all of the items that he was — that concerned us.</p> <p>10 Q. Okay. You complained about this to Libutti?</p> <p>11 A. Yes, I did.</p> <p>12 Q. What's your basis for thinking it was because you're a woman that he transferred these things to Tim O'Neill? Do you have a basis for it?</p> <p>13 A. I was the only woman, female director.</p> <p>14 Q. Any other reason?</p> <p>15 A. Probably that's because Libutti came with the reputation of, you know, treating women as -- not treating women well.</p> <p>16 Q. He came with that reputation?</p>

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<p>1 LORUSSO 2 passed on to us? 3 A. Yes, of course. 4 MS. KURZON: Or notes that you reviewed 5 because they've been produced by Alitalia? 6 THE WITNESS: Of course. 7 Q. In paragraph 20 you say that he "shifted 8 duties to a less experienced male colleague." 9 Who was that? Was that Tim O'Neill? 10 A. Yes, it is. 11 Q. Less experienced in what way? 12 A. In marketing. 13 Q. What's Tim O'Neill's background? Sales? 14 A. Yes. 15 Q. Tim O'Neill is approximately your age or a 16 little older? 17 A. A little older. 18 Q. Do you know if he came to the travel 19 industry, the airline industry late in life? 20 A. No. 21 Q. As far as you know, that's what he's 22 always done? 23 A. Yes. 24 Q. What tasks were given to Francesca Forte 25 as alleged in paragraph 22?</p>	<p>Page 202</p> <p>1 LORUSSO 2 Q. Do you know when that occurred? 3 A. I don't remember at this time. 4 Q. Were you still at GA2000 when she was 5 transferred to Rome? 6 A. I believe so. 7 Q. Had you just begun in GA2000 when she was 8 transferred to Rome? 9 A. I don't remember. 10 Q. And, as you said, they split up your 11 responsibilities and gave them to different people? 12 A. Yes. 13 Q. Anybody besides Tim O'Neill and Francesca 14 Forte? 15 A. I believe Lisa Del Percio was doing a few 16 things, and she was -- 17 Q. Lisa, L-I-S-A? 18 A. Yes. 19 Q. Del Persio. 20 Do you recall anything specific that Lisa 21 was doing that you had done? 22 A. That my department had done? She was 23 handling barter, promotional barter. 24 Q. Was she a manager? 25 A. No.</p>
<p>1 LORUSSO 2 A. Francesca Forte was given the 3 responsibility of advertising. 4 Q. Francesca Forte got the responsibilities 5 of advertising? 6 A. Yes. 7 Q. What was her position prior to your 8 transfer to GA2000? 9 A. I don't remember her title, but she 10 reported to me. 11 Q. Was she a manager? 12 A. No. 13 Q. She was an administrative assistant? 14 A. I think her title had representative in 15 it, the word "representative." 16 Q. And she got the same responsibilities for 17 advertising that you had had? 18 A. Yes, she did. My work was split up. 19 Q. Isn't it true that advertising was moved 20 to Rome at this time; in 2004? 21 A. Actually, it was supposed to have been 22 moved to Rome, but I believe that first Francesca 23 Forte was working on it in New York and then she was 24 transferred along with the responsibility. She was 25 transferred to Rome.</p>	<p>Page 203</p> <p>1 LORUSSO 2 Q. Had she been doing that before you went to 3 GA2000, under your supervision, I mean? 4 A. No, no. She reported directly to Libutti. 5 She was his assistant. 6 Q. She was this assistant? 7 A. Yes. 8 Q. His administrative assistant? 9 A. Yes. 10 Q. So she got the administrative barter -- 11 pardon me, the promotional barter? 12 A. Yes. 13 Q. Can you think of anybody else that got 14 some of your responsibilities? 15 A. Not at this time. 16 Q. Paragraph 24 states that you knew that 17 GA2000 would soon close. Your testimony earlier was 18 that you were concerned that it might close because 19 Alitalia was closing subsidiaries. 20 Did you have any specific knowledge that 21 it would close or does "knew" here mean really 22 suspected? 23 A. I suspected. 24 Q. You feared it? 25 A. I feared it.</p>

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LORUSSO		LORUSSO	
1	A. Yes.	1	Q. Did you discuss this letter with Mr.
2	Q. D'Ilario, you are talking about really his	2	Libutti and Mr. Sciarresi at any time?
3	whole package including his ex-pat —	3	A. I don't recall.
4	A. His compensation.	4	Q. There are two CC's on this letter. One is
5	Q. — his ex-pat benefits plus his salary?	5	to TYNYC and one is to UGNYC.
6	A. His compensation, his total compensation.	6	Do you know what those stand for?
7	Q. Which consists of ex-pat benefits plus	7	A. I don't recall.
8	salary.	8	Q. Do you recall receiving this letter?
9	A. Call it what you will.	9	A. Yes, I do.
10	Q. Well, do you disagree with that?	10	Q. You did not regard this as a promotion, as
11	A. No.	11	you've testified earlier.
12	Q. Do you know what Mr. O'Neill's salary was?	12	A. No. It was a transfer.
13	A. Exactly? No, but I'm sure it was higher	13	Q. But you don't dispute that you were called:
14	than mine.	14	managing director, do you?
15	Q. Do you know what Mr. Mariotti's was?	15	A. No, I don't.
16	A. I don't remember.	16	Q. And you don't dispute that your salary was
17	Q. Do you remember what yours was in August	17	increased from \$78,520.80 to \$105,000 per annum?
18	of 2004?	18	A. That's correct.
19	A. I believe it was \$80,000.	19	Q. Correct?
20	Q. You believe that O'Neill's was higher and	20	A. Yes.
21	you believe that Mariotti's was higher?	21	Q. And you continued on all the Alitalia
22	A. Correct.	22	benefits, correct?
23	Q. And you believe that the whole value of	23	A. Correct.
24	Mr. D'Ilario's compensation package was higher?	24	Q. Did the GA2000 other employees besides you
LORUSSO		LORUSSO	
1	A. That's correct.	1	and Mr. Farrow continue on Alitalia benefits?
2	Q. Did you hear back from Mr. Sciarresi	2	A. No. Nor did they start on Alitalia
3	regarding this e-mail?	3	benefits.
4	A. I don't recall.	4	Q. "Continue" was the wrong word.
5	Q. You did eventually have a conversation	5	Did they ever get Alitalia benefits?
6	with Franco Gallo and Stephanie Di Clemente about	6	A. No.
7	it?	7	MR. KORAL: Let's look at a document we'll
8	A. Yes, I did.	8	mark Defendant's Exhibit 7 from you to Andrea
9	Q. When you were in the Cargo Division, do	9	Sciarresi dated September 1.
10	you know what your salary was relative to that of	10	MS. KURZON: September 1, 2004.
11	Mr. Baxtrum and Mr. Guidotti?	11	MR. KORAL: 2004.
12	A. No, I don't.	12	(Defendant's Exhibit 7, document, was
13	Q. So you don't know whether yours was higher	13	marked for identification as of this date.)
14	or lower than theirs?	14	Q. Do you recall sending this to Mr.
15	A. No, I don't.	15	Sciarresi?
16	MR. KORAL: Let's move on. We'll mark as	16	A. Yes, I do.
17	Defendant's Exhibit 6 a letter signed by Mr.	17	Q. And you copied Mr. Libutti?
18	Scerasi and Mr. Libutti dated September 1, 2004	18	A. Yes, I did.
19	and stamped September, I believe it's 22, 2004.	19	Q. You hadn't copied him on the letter we
20	MS. KURZON: May I have a copy, please?	20	just looked at, which was Exhibit 6, I believe.
21	MR. KORAL: I'm sorry..	21	Is there a reason why you didn't?
22	It's stamped September 2, 2004. To you.	22	MS. KURZON: He signed it.
23	(Defendant's Exhibit 6, letter, was marked	23	MR. KORAL: Not 6, 5. The other e-mail to
24	for identification as of this date.)	24	Sciarresi.

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<p style="text-align: right;">Page 234</p> <p>1 LORUSSO 2 work. I think you testified that was the 3 advertising. 4 A. Yes. 5 Q. Do you know if Francesca Forte ever ran an 6 advertising campaign? 7 MS. KURZON: Prior to being given — 8 MR. KORAL: No. 9 Q. After being given these responsibilities, 10 did she ever run an advertising campaign? 11 A. I don't know. 12 Q. Wasn't all advertising at that point being 13 done in Rome? And by "done" I mean created and 14 handled by Rome. 15 A. I don't know. 16 Q. I think you already testified that she was 17 transferred to Rome eventually. 18 A. Yes. 19 Q. Sometime after the summer of 2005? 20 A. I don't recall. 21 Q. When Francesca Forte reported to you, what 22 did she do? What were her responsibilities? 23 I know you said you don't remember her 24 title. Do you remember what her responsibilities 25 were?</p>	<p style="text-align: right;">Page 236</p> <p>1 LORUSSO 2 medical benefits, but that you rejected the offer. 3 My first question is: Did he make this 4 offer in writing? 5 A. No. 6 Q. Were any of these negotiations I'll call 7 them about possible severance package done in 8 writing? 9 A. No. 10 Q. So these were all just conversations with 11 Libutti and Gallo? 12 A. Correct. 13 Q. But it was Libutti who offered the two 14 years? 15 A. Yes. 16 Q. Did he offer it to you as a solid offer or 17 did he say he would try to get it for you? 18 A. I don't recall. 19 Q. You say you rejected the offer because you 20 wanted to continue working; is that right? 21 A. Yes, sir. 22 Q. Now, you had already been looking for jobs 23 according to this. 24 A. Yes. 25 Q. And you had not been coming up with any?</p>
<p style="text-align: right;">Page 235</p> <p>1 LORUSSO 2 A. A lot of the work that Elizabeth and 3 Francesca did overlapped, so I don't remember 4 specifically what Francesca was doing. 5 Q. That's Elizabeth Santella? 6 A. Yes. 7 Q. Did it have something to do with 8 advertising? 9 A. Yes. 10 Q. To whom did Francesca report after you 11 went to GA2000? 12 A. To Giulio Libutti. 13 Q. She reported directly to Giulio? 14 A. I believe so. 15 Q. Who, if anybody, until the summer of 2005, 16 was handling advertising? Was Mr. Libutti doing 17 that himself? 18 A. I don't remember. 19 Q. Okay. You state at the top of page 5 that 20 you had several meetings with Gallo and Libutti 21 about a possible severance package. 22 Who initiated those conversations? 23 A. I don't recall. 24 Q. You state that Mr. Libutti offered you two 25 years' salary, lifetime airline ticket benefits and</p>	<p style="text-align: right;">Page 237</p> <p>1 LORUSSO 2 A. No. 3 Q. Because of your age and your level? 4 A. I believe so. 5 Q. Did the headhunters tell you that? 6 A. No. 7 Q. They did not say, Oh, you're too old to 8 get a job. You've got to stay where you are, alone 9 on the 36th floor. 10 They did not say something like that? 11 A. No. Not that I recall. 12 Q. Once you were in Cargo, what were your 13 activities? What jobs, tasks did you perform? 14 A. It wasn't clear. 15 Q. Okay. It states here, third paragraph. 16 from the bottom on page 5 you began working on an 17 e-mail database. 18 Was that assigned to you? 19 A. No. It was not. 20 Q. It was something that you saw a need for 21 and decided to develop? 22 A. That is correct. 23 Q. In fact, it was to be a Cargo contacts 24 directory, wasn't it? Wasn't that what you 25 envisioned?</p>

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1	LORUSSO	1	LORUSSO
2	A. Clients directory. Yes, a client	2	compensation with Mr. Gallo?
3	database.	3	A. No. I did not.
4	Q. And you distributed drafts of it at	4	Q. Let's take a look at page 6, the second
5	different time to various managers and directors in	5	full paragraph. This deals with Mr. Mariotti. Mr.
6	Cargo and asked them for input?	6	Mariotti had been pricing director, it says, and
7	A. Yes.	7	then in May he became director sales and marketing
8	Q. And you got that input from them?	8	coordination, Passenger Division, and he got the
9	A. Yes.	9	customer relations department.
10	Q. You also put together newsletters?	10	So at this point in time Mr. Mariotti had
11	A. Yes.	11	pricing, he had customer relations. He also had
12	Q. And also, didn't you develop fliers?	12	sales coordination and the alliance, didn't he?
13	A. Yes, I did.	13	A. I don't recall. I do remember him having
14	Q. Didn't you get a lot of very positive	14	pricing and customer relations.
15	feedback about the fliers you developed?	15	Q. How about sales coordination?
16	A. Yes, I did.	16	A. I don't recall.
17	Q. Certainly from Canada, in any event, and	17	Q. His title is director sales and marketing
18	Chicago?	18	coordination, Passenger Division?
19	A. I believe so.	19	A. Right.
20	Q. So you weren't without things to do,	20	Q. Did he ever tell you that he had -- what
21	although some of these were things that you	21	his responsibilities were?
22	developed yourself such as the idea for the	22	A. I knew his responsibilities as pricing
23	database, correct?	23	director and marketing. I wasn't quite clear on the
24	A. That is correct.	24	sales coordination part.
25	Q. You state that Mr. DiFeo was given a	25	Q. Marketing coordination, correct?
	Page 239		Page 241
1	LORUSSO	1	LORUSSO
2	yearly stipend of approximately \$60,000 for his	2	A. Right.
3	apartment. How did you know that?	3	Q. In Passenger?
4	A. I don't remember. I don't recall.	4	A. Right.
5	Q. Are you aware that Mr. DiFeo is an	5	Q. You weren't really interacting with him in
6	ex-patriot?	6	business because you were in Cargo and there was no
7	A. Yes.	7	real need to interact with Mr. Mariotti except on a
8	Q. And you know that ex-patriot compensation	8	friendly level; is that correct?
9	is very different from a local national.	9	A. That's correct.
10	compensation?	10	Q. Are you aware that Lucia Alla now is
11	A. Yes.	11	responsible for pricing?
12	Q. Ex-patriots often get living allowance and	12	A. Yes.
13	schooling allowances and taxes grossed up and all	13	Q. And that she is responsible for sales
14	that stuff. Are you aware of that?	14	coordination?
15	A. Yes, I am.	15	A. If that's her title, then yes.
16	Q. How do you know that Mr. DiFeo's salary	16	Q. I'm not representing what her title is.
17	was \$95,000?	17	A. Okay.
18	A. I don't recall.	18	Q. Also, she is responsible for customer
19	Q. Do you know for a fact that it is or	19	relations, correct?
20	you're not really sure?	20	A. I am aware that she took Gabriele
21	MS. KURZON: Objection:	21	Mariotti's position.
22	Q. Do you know for a fact that his salary was	22	Q. Okay. And you didn't hear anything to
23	\$95,000?	23	suggest that she didn't get all of it. She is doing
24	A. No, I don't know for a fact.	24	basically what Mariotti was doing?
25	Q. Did you ever discuss Mr. DiFeo's	25	A. Correct.

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<p style="text-align: right;">Page 206</p> <p>1 LORUSSO</p> <p>2 Q. Twenty-eight states, "In or around the 3 summer of 2005, Mr. Libutti announced that the 4 company intended to rejuvenate the New York office 5 and get rid of the 'old faces.'"</p> <p>6 You say "announced." Was this at a 7 meeting?</p> <p>8 A. I don't recall.</p> <p>9 Q. Was this the statement that Mr. Mariotti 10 reported to you or are you thinking of something 11 specific? Something else, I mean.</p> <p>12 A. I believe it was the statement that 13 Mariotti reported to me.</p> <p>14 Q. So you never heard Libutti say this?</p> <p>15 A. No.</p> <p>16 Q. Paragraph 30 states that in October of 17 2005 you again complained of age and gender 18 discrimination.</p> <p>19 To whom did you make that complaint?</p> <p>20 A. I don't recall.</p> <p>21 Q. Do you recall whether it was in writing?</p> <p>22 A. I think I did put it in writing.</p> <p>23 Q. All right. I haven't seen — I'll just 24 represent to you I have not seen anything in writing 25 between 2004 and, let's say, 2006. I haven't seen</p>	<p style="text-align: right;">Page 208</p> <p>1 LORUSSO</p> <p>2 anything, or, if so, what they said?</p> <p>3 A. Right.</p> <p>4 Q. Now, when GA2000 was closed, what happened 5 to the employees of GA2000?</p> <p>6 A. We let them go.</p> <p>7 Q. They were all terminated?</p> <p>8 A. They were all terminated.</p> <p>9 Q. What kind of severance did they get?</p> <p>10 A. Two weeks' salary.</p> <p>11 Q. Two weeks' salary, period?</p> <p>12 A. Yes.</p> <p>13 Q. And the only exceptions to that were 14 yourself, who was kept on, although you may not have 15 had responsibilities to perform, and Mr. Farrow who 16 took early retirement?</p> <p>17 A. Right. And the two of us were employed by 18 Alitalia and all the employees that were terminated 19 were employed by GA2000.</p> <p>20 Q. Those employees were quite young, weren't 21 they, for the most part?</p> <p>22 A. The GA2000 employees?</p> <p>23 Q. Yes.</p> <p>24 A. It was mixed.</p> <p>25 Q. Mixed?</p>
<p style="text-align: right;">Page 207</p> <p>1 LORUSSO</p> <p>2 an October 2005 complaint.</p> <p>3 I just wonder, do you remember whether it 4 was in writing?</p> <p>5 A. No. I don't remember.</p> <p>6 I believe that October 2005 was when I was 7 told that GA2000 was closing, therefore I, most 8 probably, said at that time to Libutti and Gallo 9 that this was done on purpose.</p> <p>10 Q. You don't have a specific recollection of 11 saying that to Libutti and Gallo?</p> <p>12 A. Yes. I did say it to them.</p> <p>13 Q. You have a specific recollection?</p> <p>14 A. I have a specific recollection.</p> <p>15 Q. Can you remember where that was said?</p> <p>16 A. It must have been in Libutti's office. I 17 am not certain.</p> <p>18 Q. You don't recollect that?</p> <p>19 A. I don't recollect that.</p> <p>20 Q. But you recollect saying it?</p> <p>21 A. Yes.</p> <p>22 Q. Do you recollect what reaction you got 23 from either one of them?</p> <p>24 A. No. I don't recollect.</p> <p>25 Q. You don't recall if either of them said</p>	<p style="text-align: right;">Page 209</p> <p>1 LORUSSO</p> <p>2 A. I think so.</p> <p>3 Q. They weren't mostly young, relatively 4 low-paid employees?</p> <p>5 A. They were low-paid employees and most of 6 them were hired through a temp agency.</p> <p>7 Q. You didn't do the hiring. They were in 8 place when you got there, correct?</p> <p>9 A. Most of them, yes.</p> <p>10 Q. Who was your predecessor as general 11 manager of GA2000?</p> <p>12 A. Jean-Paul.</p> <p>13 Q. Say it again.</p> <p>14 A. Jean-Paul. I don't know how to spell his 15 last name.</p> <p>16 Q. J-E-A-N; hyphen, P-A-U-L?</p> <p>17 A. Correct.</p> <p>18 Q. French name?</p> <p>19 A. Yes, or Belgian, I believe he was.</p> <p>20 Q. Can you pronounce his last name?</p> <p>21 A. Steurve, S-T-E-U-R-V-E. Something like 22 that.</p> <p>23 Q. He was general manager of GA2000 before 24 you took over?</p> <p>25 A. I don't know if that was his exact title,</p>

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